

WILMERHALE

**VIA ECF**

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February 27, 2018

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Hon. Gabriel W. Gorenstein  
Chief U.S. Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Sasso v. JP Morgan Chase Bank*, No. 17-cv-07722 (S.D.N.Y.)

Dear Judge Gorenstein:

We represent Defendant Chase Bank USA, N.A. (“Chase”), sued as JP Morgan Chase Bank, in the above-referenced case. We write in response to Mr. Andreu’s February 20, 2018 email regarding the timing for a potential settlement conference. Before setting a time on the Court’s calendar, we conferred in good faith with plaintiff’s counsel regarding settlement—and more specifically, to request a settlement demand, to be able to determine whether mediation efforts are warranted at this time. Based on those discussions, as we explained in detail to plaintiff’s counsel Michael Kind by telephone yesterday afternoon and again by email to plaintiff’s counsel Ramona Ladwig this afternoon, we do not believe that a settlement conference would be productive. Rather than waste Your Honor’s time, Chase intends to move forward with a summary judgment motion before Judge Broderick. If that motion is unsuccessful, we will notify Your Honor at which time both parties believe that a settlement conference will be productive.

Regards,

/s/ Noah Levine

Noah Levine

cc: All Counsel of Record (via ECF)